

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
ex rel. JOHN M. GREABE,)	
)	
Plaintiff,)	
)	
vs.)	
)	C.A. No. 04-11355-MEL
BLUE CROSS BLUE SHIELD)	
ASSOCIATION and ANTHEM BLUE)	
CROSS BLUE SHIELD OF NEW)	
HAMPSHIRE,)	
)	
Defendants.)	
)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PLAINTIFF/RELATOR'S MOTION TO POSTPONE COMPUTATION OF DAMAGES
REQUIRED BY F.R.C.P. 26(a)(1) AND OF THE SETTLEMENT PROPOSAL
REQUIRED UNDER L.R. 16.1(C)**

Defendants Blue Cross Blue Shield Association and Anthem Blue Cross Blue Shield Of New Hampshire ("Defendants") hereby move the Court for an unopposed extension of time through and including August 17, 2007 to respond to Plaintiff/Relator's Motion to Postpone Computation of Damages Required by F.R.C.P. 26(a)(1) ("Motion") and of the Settlement Proposal Required under L.R. 16.1(C) ("Settlement Proposal"). In support of this unopposed motion, Defendants state:

1. This is Defendants' first request for an extension of time. Defendants seek this extension of ten (10) days because one of their attorneys is on vacation through August 20, 2007 and another is involved in an evidentiary hearing out of state.
2. Relator's counsel does not oppose this request. Defendants are not aware of any other deadlines that would be affected by this request.

WHEREFORE, Defendants Blue Cross Blue Shield Association and Anthem Blue Cross Blue Shield Of New Hampshire respectfully request that the Court enter an order granting its Motion for Extension of Time to file a response to Plaintiff/Relator's Motion to Postpone Computation of Damages Required by F.R.C.P. 26(a)(1) ("Motion") and of the Settlement Proposal Required under L.R. 16.1(C) through and including August 17, 2007.

Respectfully submitted,

ANTHEM BLUE CROSS BLUE SHIELD
OF NEW HAMPSHIRE,

By its attorneys,

/s/ Michael J. Tuteur

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Respectfully submitted,

BLUE CROSS BLUE SHIELD
ASSOCIATION,

By its attorneys,

/s/ Nicholas J. Nesgos

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Dated: August 7, 2007

/s/ Adam P. Feinberg

Anthony F. Shelley (admitted *pro hac vice*)
Adam P. Feinberg (admitted *pro hac vice*)
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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2007 the foregoing document has been filed by electronic means through the ECF system. Any persons not receiving notification through ECF as noted on the Notification of Electronic Filing will be conventionally served by first class mail.

/s/ Michael J. Tuteur